

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Mahmoud KHALIL,

Petitioner,

v.

Donald J. TRUMP, in his official capacity as President of the United States; William P. JOYCE, in his official capacity as Acting Field Office Director of New York, Immigration and Customs Enforcement; Caleb VITELLO, Acting Director, U.S. Immigration and Customs Enforcement; Kristi NOEM, in her official capacity as Secretary of the United States Department of Homeland Security; Marco RUBIO, in his official capacity as Secretary of State; and Pamela BONDI, in her official capacity as Attorney General, U.S. Department of Justice,

Respondents.

Case No. 25-cv-01935

DECLARATION OF SAMAH SISAY

I, Samah Sisay, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. My name is Samah Sisay. I am a licensed attorney in good standing in the state of New York. I am an attorney of record in the above-captioned case.
2. I represent the petitioner, Mahmoud Khalil, in this action.
3. At approximately 11:24pm on March 14, 2025, I logged on to ECF in order to begin filing Petitioner's motion for release under *Mapp v. Reno*, ahead of the 11:59am deadline. When I attempted to file the notice of motion, I received an error message: "ERROR: Document is malformed or contains code which may cause an external action (such as launching an

application). This PDF document cannot be accepted.” I attempted to re-“flatten” the document as advised by the ECF guide, but the filing was still not accepted.

4. I contacted co-counsel Mudassar Toppa, Shezza Abboushi Dallal, and Alina Das, each of whom attempted to flatten and file the PDF and were unable to do so; each received the same error message.
5. We decided to convert each of the documents into new PDFs. I successfully filed the notice of motion at 12:12am and began to convert and file the remaining documents thereafter. Because of the number of discrete documents in the filing, including numerous redacted and unredacted exhibits, the process for converting each of the filings was time-consuming.
6. Alina Das contacted counsel for Respondents to seek their position on our request for leave to accept the late filing, but we did not hear back given the late hour.

Executed on March 15, 2025
New York, New York

/s/ Samah Sisay
Samah Sisay
Staff Attorney
Center for Constitutional Rights